

\*\*\* ENFORCEMENT CONFIDENTIAL \*\*\*

Gulfco Briefing 12-15-10

**Purpose: Decision on Gulfco cap repair approach.**

Current Status:

- Sediment removal not required – toxicity test found that site is not different from background.
- EPA & TCEQ staff agrees that sediment removal is not required.
- PRPs are willing to start the cap repair as soon as EPA decides on the approach.

Why cap repair needed:

- Cap is rutted on top – severe winter storms may erode cap and allow water infiltration through contaminated sludges and ground water below cap.
- Loss of cap integrity may result in contamination spreading to the surrounding wetlands and surface water.
- Brazoria County and the City of Freeport are classified as “critical” areas for winter storms and “catastrophic” for hurricanes and tropical storms. (from Houston-Galveston Area Council of Governments Regional Hazard Mitigation Plan; approved 4/28/2006; expires 4/2011).
- Contaminants below cap include 1,1,1-trichloroethane, 1,1-dichloroethene, 1,2,3-trichloropropane, 1,2-dichloroethane, benzene, 1,2-dichloroethene, methylene chloride, tetrachloroethene, trichloroethene, and vinyl chloride.

How to get it done:

- EPA contractors performing cap and wetland inspection today 12/15/2010.
- Receive inspection report on Friday, 12/17/10; use inspection report facts for removal AOC for cap repair.
- Prepare AOC and workplan for cap repair.
- Prepare action memo/enforcement attachment for cap repair.
- PRPs and EPA sign AOC & begin cap repair work.
- Hold public comment period no later than 60 days after work starts.

Background:

- Tank removal in progress – field work completion due by 1/27/2011.
- EE/CA in progress – draft due by 12/31/2010.
- RI Report & BERA Report due 2/6/2011.